

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA

(1) RITA DIANE BLAKE, an individual.)
)
)
Plaintiff,)
)
)
v.) Case No. CIV-16- 783-R
)
)
(1) FAA CREDIT UNION;)
(2) JULIE GAMBLIN, an individual; and)
(3) STEVE RASMUSSEN, an individual,)
)
Defendants.)

NOTICE OF AND CONSENT TO REMOVAL

Defendants FAA Credit Union, Julie Gamblin and Steve Rasmussen (“Defendants”), pursuant to 42 U.S.C. § 2000e, Title VII, file this Notice of and Consent to Removal with respect to Case No. CJ-2016-608 in the District Court of Cleveland County, State of Oklahoma. In support of this notice, Defendants respectfully states the following:

1. On May 25, 2016, Plaintiff filed a Petition entitled *Rita Diane Blake v. FAA Credit Union, Julie Gamblin and Steve Rasmussen*, in the District Court of Cleveland County, State of Oklahoma, Case No. CJ-2016-608 (the "State Court Action"). FAA Credit Union was served with Plaintiff's Petition on April 16, 2015. Copies of all process, pleadings, and orders filed or served upon Defendants in this action, as well as a copy of the state court docket sheet, are attached hereto as Exhibit 1, pursuant to 28 U.S.C. § 1446(a) and LCvR 81.2.

2. This Notice of Removal is timely filed pursuant to 28 U.S.C. § 1446(b), in that it is being filed within thirty (30) days of service upon FAA Credit Union of the initial pleading in which a removable claim was asserted.

3. FAA Credit Union may remove this action pursuant to 28 U.S.C. § 1441(c) because Plaintiff has asserted a claim against FAA Credit Union for violation of a federal statute, 42 U.S.C. §2000e, Title VII of the Civil Rights Act of 1964. This Court has subject matter jurisdiction pursuant to 28 U.S.C. § 1331.

4. Each individual named Defendants, Gamblin and Rasmussen hereby consent.

5. Written notice of this Notice of and Consent to Removal has been given to Plaintiff together with a copy hereof and supporting papers, and will be promptly filed with the Clerk of the District Court of Cleveland County, State of Oklahoma, as required by 28 U.S.C. § 1446(d). There are no pending motions in Cleveland County. The docket sheet is attached hereto as Exhibit 2 and the Civil Cover Sheet as Exhibit 3.

WHEREFORE, Defendants state that this action is properly removable and respectfully requests that this action now pending before the District Court of Oklahoma County, State of Oklahoma, be removed to this Court.

DATED: July 11, 2016.

Respectfully submitted,

s/Kathryn D. Terry
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CERTIFICATE OF SERVICE

I do hereby certify that on the 11th day of July, 2016 the foregoing document was served upon counsel of record set forth below via regular mail to:

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